

Capitol Region Water Nine Minimum Controls Plan Comments

The Environmental Protection Agency (EPA) has reviewed the Nine Minimum Controls Plan (NMC Plan) dated August 2019 prepared by Capital Region Water (CRW). This Plan appears to be in general conformance with USEPA's 1995 Combined Sewer Overflow (CSO) NMC Policy with some exceptions. Following are EPA's comments regarding the overall conformance of the CRW NMC Plan to CSO Policy requirements:

Minimum Control #1 – Review of Operation & Maintenance Program

Section 1.2.2.2 – Field Maintenance Equipment:

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- **Ex. 5 Deliberative Process (DP)**
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Section 1.2.3 – Remedial Work Prioritization:

- **Ex. 5 Deliberative Process (DP)**

Section 1.4.1 – O&M of CSO Regulator Structures - Inspection Procedures/Schedules:

- **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

Section 1.5.1 – O&M of Outfalls/Backflow Prevention Gates - Inspection Procedures/Schedules:

- ## **Ex. 5 Deliberative Process (DP)**

Section 1.6.1 – O&M of Interceptors - Inspection Procedures/Schedules:

- ## **Ex. 5 Deliberative Process (DP)**

Section 1.7.1 – O&M of Pump Stations - Inspection Procedures/Schedules:

- ## **Ex. 5 Deliberative Process (DP)**

Section 1.8.1 – O&M of Force Mains - Inspection Procedures/Schedules:

- ## **Ex. 5 Deliberative Process (DP)**

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Section 1.9.1 – O&M of Collection System Sewers - Inspection Procedures/Schedules:

- **Ex. 5 Deliberative Process (DP)**

Section 1.9.3 – O&M of Collection System Sewers – Documentation of Current Control Practices:

- **Ex. 5 Deliberative Process (DP)**

- Section 1.10.1 – O&M of Inlets/Catch Basins – Inspection Procedures/Schedules:

- **Ex. 5 Deliberative Process (DP)**

Minimum Control #2: Maximum Use of the Collection System for Storage:

Section 2.2 – Combined Sewer Inspection:

- **Ex. 5 Deliberative Process (DP)**

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Section 2.4 – Adjustment of Regulator Settings:

- **Ex. 5 Deliberative Process (DP)**

Section 2.5 – Installation of In-System Controls:

- **Ex. 5 Deliberative Process (DP)**

Minimum Control #3 – Review & Modification of Industrial Pretreatment Programs:

- **Ex. 5 Deliberative Process (DP)**

Minimum Control #4 – Maximize Flows to the POTWs:

- **Ex. 5 Deliberative Process (DP)**

Minimum Control #5 – Prohibiting CSO Discharges During Dry Weather:

- **Ex. 5 Deliberative Process (DP)**

Minimum Control #6 – Control of Solid and Floatable Material in CSO Discharges:

- **Ex. 5 Deliberative Process (DP)**

Minimum Control #7 – Pollution Prevention Programs:

- **Ex. 5 Deliberative Process (DP)**

Minimum Control #8 – Public Notification:

- **Ex. 5 Deliberative Process (DP)**

Minimum Control #9 – Inspection, Monitoring, and Reporting:

- **Ex. 5 Deliberative Process (DP)**